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Attorney for Defendant
DANNY ARTHUR NUNEZ

7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 UNITED STATES,)	Case No. CR-10-00567-AHM
11 Plaintiff,)	
12 v.)	STIPULATION FOR ISSUANCE OF PRE-
13 DANNY ARTHUR NUNEZ,)	TRIAL SUBPOENA
14 Defendant.)	

15
16 Defendant, Danny Nunez, by and through his counsel, Mark Kassabian, and
17 plaintiff United States of America, by and through its counsel, Christopher
18 Pelham, hereby stipulate to an order for the issuance of a subpoena to the Los
19 Angeles County Sheriff. This subpoena is necessary to obtain reports, documents
20 and records in the above-captioned action relevant to the action. Court
21 authorization is necessary for this subpoena which requests an early return of said
22 documents.

23 Specifically, the parties are informed that Los Angeles County Sheriff
24 detective Damien Marquez in the Industry Station, the station responsible for
25 much of the law-enforcement investigation in the action, may be, or may have
26 been, involved in a romantic relationship with defendant Danny Nunez's estranged
27 wife, Eleanor Nunez.

28 The defense has demanded discovery regarding this matter from the

1 government. The government asserts that it does not have documents regarding
2 this matter.

3 The parties agree that documents in the possession of the Los Angeles
4 County Sheriff regarding these matters may be relevant to this action. The parties
5 also agree that the parties' trial preparation, and judicial efficiency, would be
6 assisted by the pre-trial return of subpoenaed documents related to these matters.

7 Accordingly, the parties stipulate to the issuance of the subpoena attached
8 hereto as Exhibit 1, and to its return date of May 4, 2011.

9
10 Respectfully Submitted,

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12 BUEHLER & KASSABIAN, LLP

13
14 DATE: April 4, 2011

15 By: /s/ Mark M. Kassabian
16 MARK M. KASSABIAN
17 Attorney for Defendant
18 DANNY ARTHUR NUNEZ

19
20 ANDRE BIROTTE
21 UNITED STATES ATTORNEY

22
23 DATE: April 4, 2010

24 By: /s/ Christopher K. Pelham
25 CHRISTOPHER K. PELHAM
26 Attorneys for Plaintiff
27 The United States Of America
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